

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

JOHN F. HANSON, JR.	§	
and JOHN F. HANSON,	§	
DMD, P.C.,	§	
Plaintiffs,	§	
v.	§	Civil Action No. 3:04-CV-30045-MAP
ORTHALLIANCE INC.,	§	
a Delaware corporation,	§	
Defendant.	§	

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**JOINT EMERGENCY MOTION TO STAY PROCEEDINGS**

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Plaintiffs John F. Hanson, Jr. and John F. Hanson D.M.D., P.C. (“Plaintiffs”) and Defendant OrthAlliance, Inc., (“OrthAlliance”) respectfully file the following Joint Emergency Motion to Stay Proceedings:

**I.**

On March 28, 2005, OrthAlliance and a group of doctors from across the nation asserting claims similar to those before this court met for settlement discussions guided by United States District Judge Philip P. Simon of the Northern District of Indiana. At the conclusion of this meeting, OrthAlliance and the doctors, including those before this Court, agreed to a proposed settlement that is subject to final approval by the doctors. The settlement, if implemented, will resolve this litigation.

**II.**

Given that there are approximately 60 doctors involved in the settlement, obtaining the doctors’ final approval of the settlement and completing the final settlement papers will take time. The parties have agreed to complete these matters within 60 days.

In light of the proposed settlement, the parties jointly request this Court to stay all proceedings in this matter for 60 days, until May 31, 2005, to afford the parties sufficient time to complete settlement papers.

Respectfully submitted,

/s/ Nolan C. Knight (with permission)

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served by electronic filing or U.S. Mail on this 1<sup>ST</sup> day of April 2005 to the following counsel of record:

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